

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JOSEPH ROGERS, DEBRA JONES  
STEVENSON, FRANK GARRIDO, TAYLOR  
ARMIGER, and GWENDOLYN THOMPSON,  
on behalf of themselves and all others similarly  
situated.

## Plaintiffs.

vs.

## ASSURANCE IQ, LLC.

Defendant.

Case No. 2:21-cv-00823-TL

**STIPULATED MOTION AND  
[PROPOSED] ORDER FOR LEAVE  
TO FILE SECOND AMENDED  
COMPLAINT**

NOTE ON MOTION CALENDAR:  
April 26, 2022

Plaintiffs Joseph Rogers, Debra Jones Stevenson, Frank Garrido, Taylor Armiger, and  
wendolyn Thompson (“Plaintiffs”), with the consent of counsel for Defendant pursuant to  
ed. R. Civ. P. 15(a)(2), hereby move this Court, in accordance with Local Civil Rule 15, for  
leave to file a Second Amended Complaint. A redline showing how the proposed Second  
Amended Complaint differs from Plaintiff’s First Amended Complaint filed on November 4,  
2021 (Dkt. No. 35) is attached hereto as Exhibit A.

The purpose of the amendment is to (a) add as a defendant Boomsourcing, Inc. (“Boomsourcing”), who physically dialed the calls for Defendant Assurance IQ, LLC (“Assurance IQ”) to a large number of putative class members, including four of the plaintiffs,

1 (b) making vicarious liability allegations with respect to Boomsourcing and the other vendor  
2 involved in contacting the plaintiffs, and (c) correcting the phone number pled for Ms.  
3 Stevenson.

4 Counsel for Defendant have stipulated to the amendment. Accordingly, Plaintiffs  
5 request that this Court enter an order granting Plaintiffs leave to file their Second Amended  
6 Complaint in the form attached hereto as Exhibit A.

7 Defendant explicitly reserves all rights and defenses as they dispute the allegations  
8 contained in the proposed Second Amended Complaint.

9 RESPECTFULLY SUBMITTED AND DATED this 26th day of April, 2022.

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8

9 **ORDER**

10 IT IS SO ORDERED.

11 Dated this 26th day of April 2022.



12 Tana Lin  
13 United States District Judge

## CERTIFICATE OF SERVICE

I, Samuel J. Strauss, hereby certify that on April 26, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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DATED this 26th day of April, 2022.

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